

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

Frank Staples, et al.,
Plaintiffs,

v.

Kelly Ayotte, Governor, et al.,
Defendants.

Case No.: 1:24-cv-00331-LM-TSM

DISTRICT OF NH
FILED

2025 JUL 24 P 11:03
24 HOUR DEPOSITORY

PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO RESPOND TO DOCUMENTS 63 AND 64

TO THE HONORABLE COURT:

NOW COMES Plaintiff Frank Staples, pro se, and respectfully moves this Court for a 14-day extension of time to file responses to the following filings submitted by Defendants:

Document 63 – Objection to Plaintiff's Motion to Compel Discovery and Rule 26(f) Conference Compliance;

Document 64 – Objection to Plaintiff's Motion for Default as to Existing Defendants.

I. PARTIAL RESPONSES COMPLETED

Plaintiff has already filed a timely response to Document 62, which addressed Defendants' objections to the extension of time to serve new defendants and the ADA accommodation request. However, additional filings were necessitated by Defendants' conduct, which significantly impacted Plaintiff's ability to respond to Documents 63 and 64 within the originally prescribed period.

II. GOOD CAUSE EXISTS FOR EXTENSION

Plaintiff respectfully submits that good cause supports this request pursuant to Federal Rule of Civil Procedure 6(b)(1)(A). In the past two weeks, Plaintiff was required to file an Emergency Motion for a Temporary Restraining Order (TRO) in this same case due to escalating conduct by the New Hampshire State Police, who are named Defendants.

In support of the TRO, Plaintiff prepared a sworn affidavit submitted to the Sheriff's Department and drafted a formal cease and desist letter addressed to both the State Police and the Governor's Office. These actions were time-sensitive, complex, and legally significant. They were directly caused by the defendants' own conduct, further burdening Plaintiff's ability to complete substantive legal responses to the remaining objections (Docs. 63 and 64).

Plaintiff is also in the process of preparing an Addendum to the Motion to Compel Discovery, which requires careful coordination and supporting documentation.

This motion is made in good faith, and the requested extension of 14 days, up to and including August 7, 2025, is intended to ensure that Plaintiff may fully and properly address the outstanding filings.

III. RELIEF REQUESTED

WHEREFORE, Plaintiff respectfully requests that this Court:

1. Grant a 14-day extension of time, through August 7, 2025, to file responses to Documents 63 and 64;

2. Grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

Dated: July ~~25~~²⁴, 2025



Frank Staples
Pro Se Plaintiff
[Mailing Address]
[Email Address]
[Phone Number]

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing motion was served via the Court's CM/ECF system on all counsel of record and via certified mail to any unregistered parties on July ~~25~~²⁴, 2025.





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